REMARKS

In the January 4, 2005 Office Action, the Examiner indicated that claims 16-39 were pending in the application and rejected claims 16-39 under 35 USC § 102(e). In rejecting the claims, U.S. Patent 6,300,947 to Kanevsky (Reference A) was cited. Claims 16-39 remain in the case. The Examiner's objections and rejections are traversed below.

Rejection under 35 USC § 102(e)

On pages 2-6 of the Office Action, claims 16-39 were rejected under 35 USC § 102(e) as anticipated by Kanevsky using the same language as in the May 19, 2004 Office Action, except for the rejection of claims 37-39 which were not discussed in the May 19, 2004 Office Action. Since nothing new in Kanevsky was cited in the rejection of claims 37-39, the comments below will primarily address the Response to Argument on page 6 of the January 4, 2005 Office Action which responded to the Applicant's arguments in the December 19, 2004 Amendment.

In response to Applicant's argument that "Kanevsky fails to teach 'predetermined control characters" as recited at, e.g., claim 16, line 4, the Response to Argument states that "Kanevsky teaches displaying of icon (fig. 12, item icon; Examiner interprets icon to be a predetermined control character)." No further explanation was provided of how an icon can perform the function of a control character, particularly, the operation of "mapping the first data onto second data according to the parameter, based on the predetermined control characters" (claim 16, last two lines). The Brief Description of the Drawings section of Kanevsky describes Fig. 12 as "a diagram illustrating an example of data separation according to the invention" (column 4, lines 38-39). The only mention of Fig. 12 is at column 16, lines 16-29 which describes what is illustrated in Fig. 12 as an original web page 1401, a first adapted web page 1402 and "a new web page 1404 which is not specially adapted to a screen since the size of picture is not known in advance of display" (column 16, lines 24-26). The "original web page contains objects: ICON 1 and TEXT 2 that belong to group S1 and a PICTURE 3 that belongs to group S2" (column 16, lines 16-18), while the "first adapted web page 1402 contains objects ICON 1 and TEXT 2 that fit a smaller screen size of a user's display" (column 16, lines 19-20). Following that is a description of activating "button 1403 ... displayed on page 1402 ... [which] links the user to ... new web page 1404" (column 16, lines 22-24) that may require "a user ... [to] move the picture (up or down or left or right) or zoom it to an appropriate size" (column 16, lines 27-29).

It is submitted that there is nothing in what is shown in Fig. 12 or described at column 16, lines 16-29 of Kanevsky that teaches or suggests "mapping the first data onto second data

according to the parameter, based on the predetermined control characters" (claim 16, last two lines). Therefore, it is submitted that claim 16 and claims 25, 34 and 35 which recite limitations similar to the quoted limitation from the end of claim 16, patentably distinguish over <u>Kanevsky</u>. Since claims 17-24, 26-33 and 36-39 depend from claims 16, 25 and 35, it is submitted that claims 17-24, 26-33 and 36-39 patentably distinguish over <u>Kanevsky</u> for at least the reasons discussed above with respect to claim 16.

Furthermore, it is submitted that the Response to Argument in the January 4, 2005 Office Action does not begin to address the detailed analysis of <u>Kanevsky</u> in the December 19, 2004 Amendment. This analysis is repeated below. The Examiner is respectfully requested to explain, either in the next Office Action, or in the Examiner Interview requested below, why the analysis below is incorrect.

The portion of <u>Kanevsky</u> cited as disclosing the first "determining" operation in claim 16 describes comparing "the display parameters from the display mode message to the numeric data received from the interpreter module 202" (column 8, lines 30-32). There is no indication that the comparison described at column 8, lines 29-34 determines whether specific characters are present in the numeric data. Rather, the purpose of the comparison is to determine "whether reconstruction of all of this web page data will fit a display size, given the information contained in the display mode message" (column 8, lines 35-38). This suggests that the comparison involves numerical values, not the mapping of control characters as recited in claim 23, for example.

Second, the comparison performed by matching module 203 in Kanevsky does not involve anything that is "predetermined" as required by the independent claims. As discussed in the December 19, 2004 Amendment, the matching module 203 in Kanevsky "compares the display parameters from the display mode message to the numeric data" (column 8, lines 30-31), where "the interpreter module 202 receives the web page data containing the URL/CGI instructions and reads, therefrom, numeric data associated with the URL/CGI textual instructions" (column 7, lines 63-66), while the display mode message accompanies a request message from a client device that contains an "address that defines the route to a file on a server computer on the World Wide Web" (column 6, lines 13-15). Thus, the comparison performed by the matching module 203 in Kanevsky involves dynamic information that at least changes for each device and each web page, while the first determining operation performed in the independent claims involves predetermined characters. This is another way in which the

Serial No. 09/936,690

recited operation differs from the comparison performed by the matching module 203 in

Kanevsky.

In other words, while both Kanevsky and the present invention are directed to solving

similar problems, i.e., displaying web pages on devices of limited capacity, the operations

performed to accomplish this task are different. Therefore, it is submitted that claims 16-39

patentably distinguish over Kanevsky.

Request for Examiner Interview

If the rejection of the claims as anticipated by Kanevsky is not withdrawn, it is respectfully

requested that the Examiner contact the undersigned by telephone to arrange an Examiner

Interview prior to issuing another Office Action to discuss the differences between the

invention and the prior art and what changes, if any, in claim language are necessary to clearly

recite these differences.

Summary

It is submitted that Kanevsky does not teach or suggest the features of the present

claimed invention. Thus, it is submitted that claims 16-39 are in a condition suitable for

allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly

solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is

requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge

the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

5/4/05

Registration No. 31,106

1201 New York Avenue, NW, Suite 700

Washington, D.C. 20005

Telephone: (202) 434-1500

Facsimile: (202) 434-1501

8